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Wynn Las Vegas, LLC and Wynn Resorts, Ltd.*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BRENNA SCHRADER, an individual, on
behalf of herself and all others similarly
situated,

Plaintiff,

vs.

STEPHEN ALAN WYNN; an individual;
MAURICE WOODEN, an individual, WYNN
LAS VEGAS, LLC dba WYNN LAS VEGAS
a Nevada Limited Liability, WYNN
RESORTS, LTD, a Nevada Limited Liability
Company; and DOES 1-20, inclusive; ROE
CORPORATIONS 1-20, inclusive,

Defendants.

Case No. 2:19-cv-02159-JCM-BNW

**STIPULATION TO EXTEND TIME
FOR:**

- (1) THE PARTIES TO FILE THE
DISCOVERY PLAN AND
SCHEDULING ORDER (First
Request); AND**
- (2) DEFENDANT STEPHEN ALAN
WYNN TO FILE ANSWER TO
PLAINTIFF'S FIRST AMENDED
COMPLAINT (Third Request)**

IT IS HEREBY STIPULATED by and between Plaintiff Brenna Schrader ("Plaintiff"), through her counsel Richard Harris Law Firm, Defendants Wynn Las Vegas, LLC ("WLV") and Wynn Resorts, Ltd. ("WRL"), through their counsel Jackson Lewis P.C., and Defendant Stephen Alan Wynn ("Mr. Wynn"), through his counsel Peterson Baker, PLLC, that the time for the Parties to submit the Discovery Plan and Scheduling Order, and for Defendant Mr. Wynn to file his Answer to Plaintiff's First Amended Complaint, shall be extended to and including **April 28, 2022**.

This Stipulation is submitted and based upon the following:

1 1. On May 11, 2020, the Court entered an Order granting Defendants' Motion for Stay
2 of Discovery. ECF No. 57.

3 2. On February 17, 2021, the Court entered an Order that, among other things, granted,
4 in part, Plaintiff's Motion for Leave to File her First Amended Complaint with respect to certain
5 claims. ECF No. 89. Pursuant to the Court's Order, the Clerk's Office filed Plaintiff's First
6 Amended Complaint on February 17, 2021. ECF No. 90.

7 3. On March 2, 2021, the Parties stipulated to extend the time for all Defendants to
8 respond to the First Amended Complaint from March 3, 2021, to March 17, 2021. ECF No. 91. The
9 Court entered an order approving the Stipulation on March 9, 2021. ECF No. 92.

10 4. On March 11, 2021, the Parties stipulated to extend the time for all Defendants to
11 respond to the First Amended Complaint from March 17, 2021, to March 31, 2021. ECF No. 93.
12 The Court entered an order approving the Stipulation on March 15, 2021. ECF No. 95.

13 5. On March 31, 2021, Defendant Mr. Wynn filed his motion to dismiss Plaintiff's
14 First Amended Complaint. ECF No. 99. Defendant Mr. Wynn also moved on April 7, 2021, to stay
15 discovery pending the Court's decision on the pending motions to dismiss. ECF No. 101.

16 6. On April 7, 2021, Defendants WRL and WLV filed their motion to dismiss the First
17 Amended Complaint. ECF Nos. 103. Defendants WRL and WLV also filed their respective
18 Answers to Plaintiff's First Amended Complaint that same day. ECF No. 104 and 105. Defendants
19 WRL and WLV filed a motion to stay discovery pending decision on the motions to dismiss. ECF
20 No. 106.

21 7. On October 14, 2021, the Court entered an Order granting Defendants' respective
22 motions to stay discovery. ECF No. 139. Therein, the Court ordered "that the parties are to file a
23 joint, proposed discovery plan and scheduling order within 14 days after ECF Nos. 98, 99, and 103
24 are decided." *Id.* at p. 9.

25 8. On March 31, 2022, the Court entered an order granting, in part, and denying, in
26 part, Defendants' respective motions to dismiss. ECF No. 140. Defendant Wooden has been
27 dismissed from the case entirely. *Id.*

1 9. As such, the proposed discovery plan and scheduling order is currently due on April
2 14, 2022. In addition, pursuant to FRCP 12(a)(4)(A), Defendant Mr. Wynn's answer to the First
3 Amended Complaint is due on April 14, 2022. ECF Nos. 104 and 105.

4 10. Lead counsel for Defendants WRL and WLV will be out of the country from April
5 12-20, 2022. Lead counsel for Defendant Mr. Wynn will be out of the office from April 11-April
6 18, 2022. Due to work conflicts, counsel for Defendants and counsel for Plaintiff were unable to
7 schedule and hold a Rule 26 conference prior to April 11, 2022. As a result, the Parties need
8 additional time to meet and confer in order to prepare the proposed discovery plan and scheduling
9 order, and Defendant Mr. Wynn requires additional time to prepare his answer to the First Amended
10 Complaint.

11 11. Based on the foregoing considerations, the Parties have agreed to extend the
12 deadline to submit the proposed discovery plan and scheduling order, and for Defendant Mr. Wynn
13 to file his answer to the First Amended Complaint to and including April 28, 2022.

14 12. This Stipulation is made in good faith and not for the purpose of delay.

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1 13. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed
2 as waiving any claim or defense held by any party.

3 Dated this 11th day of April, 2022.

4 RICHARD HARRIS LAW FIRM

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17 Attorney for Defendant
18 Stephen Alan Wynn

19 **ORDER**

20 IT IS SO ORDERED:

21 

22 United States Magistrate Judge

23 Dated: April 19, 2022